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Attorney for Defendant
Nicholas Daniel SOLIS

UNITED STATES DISTRICT COURT,

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Nicholas Daniel SOLIS

Defendant.

Court Case#: **1:21-CR-00083-DAD-BAM-1**

**STIPULATION AND ORDER TO MODIFY
DEFENDANT'S CURFEW.**

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Justin Gilio, and defendant, Nicholas Daniel Solis, by and through his counsel, Yan E. Shrayberman, hereby stipulate to modify Nicholas Daniel Solis' curfew to 10:00 p.m. to 6:00 a.m. daily.

Additionally, parties hereby stipulate to the removal of the requirement that Mr. Solis reside with a 3rd party custodian.

Furthermore, parties hereby stipulation add additional following language to Mr. Soli's pretrial release conditions:

"Participate in a program of medical or psychiatric treatment including treatment for drug or alcohol dependency, as approved by the PSO; you must

1 pay all or part of the costs of the counseling services based upon your ability
2 to pay, as determined by the PSO.”

3 According to the assigned Pretrial Services Officer, the Better Choices Court
4 Program (BCCP) judge in Fresno has indicated she is in favor of such modification
5 given that Mr. Solis has been participating in the BCCP program with much
6 positivity and has made great progress. The Pretrial Services Officer reports that
7 Mr. Solis is in compliance with his conditions of release. Pretrial Services
8 recommends the Curfew being modified to 10:00 p.m. to 6:00 a.m., the removal of the
9 condition of residence with a 3-rd party custodian and the addition of the
10 participation on a treatment program language. Based on Pretrial Services’
11 recommendation, the government has no objection to this request.

12 Accordingly, the parties respectfully request the Court adopt this proposed
13 stipulation.

14 IT IS SO STIPULATED.

15 Dated: September 23, 2022

PHILLIP A. TALBERT
United States Attorney

16 By: /s/ Justin Gilio
17 JUSTIN GILIO
Assistant United States Attorney

18 Dated: September 23, 2022

/s/ Yan E. Shrayberman
19 YAN E. SHRAYBERMAN
Attorney for Defendant
20 NICHOLAS DANIEL SOLIS

21
22 IT IS SO ORDERED.

23
24 Dated: September 26, 2022

/s/ Eric P. Gray
25 UNITED STATES MAGISTRATE JUDGE